

## REMARKS

Claims 1-41 are pending. Claims 1-35 and 38-41 stand rejected under §102(e) over Foreman, US Pat 6,469,711; and under 35 USC §103(a) over Foreman in view of Danial, US Pat 5,940,806. Claims 36 and 37 have been withdrawn. Claims 1-3, 7-11, 14-16, 20, 23-25, 29 and 38-40 have been amended to more particularly point out the invention. Support for the amendments are found in the specification, the drawings and in the claims as originally filed. Applicants respectfully submit that the amendments do not add new matter.

In response to Applicants' arguments filed September 2, 2003, the above-referenced Office Action states "Foreman allows the user to rearrange the order of the video shots on the storyboard (col. 8, lines 41-47). Examiner interprets the rearrangement of the video shots to be organizing a plurality of presentation images in a visual presentation."

Applicants respectfully submit that rearranging the order of the video shot description, as disclosed in Foreman, is not the same as "organizing the presentation images in a visual presentation," as recited in independent claims 1, 14, 23, and 38. Specifically, the amended claims recite that the organizing includes modifying inconsistent presentation attributes. For example, the inconsistent presentation attributes include a size attribute, a color attribute, an exposure attribute, and other presentation attributes as described on page 10 of the specification. Foreman does not disclose that rearranging the order of the video shot description includes modifying the inconsistent presentation attributes.

Furthermore, the Office Action states "Foreman teaches merging of the video clips that have redundant data (col. 8, lines 16-34). Clearly one or more of the original video clips is modified in order to have a consistent and smooth visual presentation."

Foreman discloses that a motion video data structure (Fig. 7) and a story board data structure (Fig. 6) may be combined. However, Foreman does not disclose nor suggest that

combining these data structures results in modifying inconsistent presentation attributes to be consistent presentation attributes or a "consistent and smooth visual presentation." Rather, Foreman specifically discloses that these data structures may be combined into one structure to represent the storyboard and motion video data of a motion video program. (See column 8, lines 20-24). Accordingly, Applicants respectfully submit that rearranging the video clips and/or merging two data structures into one data structure, as disclosed in Foreman, does not modify the inconsistent presentation attributes as recited in claims 1, 14, 23, and 38.

As discussed in the previous response, the dependent claims are not obvious in view of the combination of Foreman and Danial, at least for the reasons stated above and in the previous response, hence the arguments will not be repeated here.

Accordingly, Applicants respectfully request the claims be reconsidered. Furthermore, Applicants respectfully submit that the pending claims are now in condition for allowance and respectfully further request the rejections be withdrawn and the claims be allowed.

The Examiner is invited to call the undersigned at 408-720-8300 if there remains any issue with allowance of this application.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Date: March 29, 2004

By: \_\_\_\_\_



André Gibbs  
Reg. No. 47,593

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025  
(408) 720-8300